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MEMO ENDORSED

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July 14, 2015

Via ECF

Hon. Colleen McMahon
United States District Court
500 Pearl Street, Room 1640
New York, N.Y. 10007

Re: Consolidated Edison Company of New York, Inc. v. Lexington Insurance Company
Case No. 14-cv-06547-CM
Our File No.: 02331-007950

Dear Judge McMahon:

We represent defendant Lexington Insurance Company.

The purpose of this letter is to request a 14-day extension of the July 21, 2015 deadline to submit a joint pre-trial order. This request is made jointly by Lexington and plaintiff Consolidated Edison.

Our client is out of the office for part of this week. In addition, Lexington's trial lawyer, Lawrence Klein, is in trial all of this week in California. The parties agree that they will mutually benefit from the additional time to prepare the joint pre-trial order.

The deadline was extended once before. On June 1, 2015, it was reset to July 21, 2015, as the depositions in the case had not yet been completed as of that time (Doc. # 48). The depositions have since been completed. A motion for partial summary judgment by Lexington is pending.

Accordingly, the parties jointly request that the deadline to submit the pretrial order be extended from July 21, 2015 to August 4, 2015.

Thank for Your Honor's consideration of this request.

Respectfully,

Tim Kevane

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David L. Elkind

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cc: Lawrence Klein